

EXHIBIT G

Noah P. Dorman

From: John Downing
Sent: Tuesday, May 3, 2022 3:07 PM
To: Aly, Amr O.; Peter Mazur
Cc: Noah P. Dorman; Brazos v. NetGear (KASOWITZ); Jim Lennon; DLF-Lit Paras; Blumenfeld, Jack; Ying, Jennifer; Esat, Yusuf; Denti, Mitchell L.; Schoedel, Lisa M.; Nelson, David A.
Subject: WSOU v. Netgear - Core Technical Documents and Response to Netgear Letter
Attachments: 2022-05-03 Waldrop Letter re Netgear 5.2.pdf

Amr,

Please find attached the following correspondence. Also, please see below a summary of our April 21 meet and confer regarding Netgear's core technical document production. We are compiling a list of follow up questions and will be in touch shortly regarding the same. Please let us know if we have correctly summarized the meet and confer below:

Core technical documents generally: Netgear produced a number of machine readable bin files. These files are meant to be downloaded onto a device that would read them. Netgear also produced webpages, datasheets, user manuals relevant to the products. The chips related to the accused products are manufactured by Broadcom.

171 Patent: Netgear Bates 15575 is Facebook Wi-Fi implementation guide that Facebook gives to Facebook Wi-Fi API developers. Netgear indicated that there is FB code sitting on Facebook's server. Netgear did not know if there was Netgear code that interacted with the FB server/API, but Netgear agreed to look into it and let us know if there is code available.

630 Patent: M7100 Netgear 7788 manual example discussed: Software administration manual 9753, software setup manual at 10380. User manual 10414. Datasheet 15354. Command interface user manual 21633, Broadcom comprehensive product spec 46125

These materials show how the owner of the M7100 would set up the products for different classes of service. Datasheet provides protocols IEEE and RFC for disk server 54422.. Datasheet shows which protocols that the product complies with. If set up RFC2474. If product set up, products would comply with RFC 2474, but do not know what users do and do not do with product.

096 patent. 53671 lists most of the chips. Others, you would have to go product by product. CX80 product IEEE 80211ac standard. Netgear 1, Netgear 432, we provided datasheet which provides information about mu-Mimo. Provides information about frequencies at Netgear 444 user manual, which provides information about how to change Wi-Fi modes and frequency, talks about 17642 Document and chipsets and explicit beamforming and mu-Mimo. 17643, p1 exit tells chipset document and explicit beamforming and frequency. 53671 features spreadsheet identifies Wi-Fi radio chips if explicit beamforming and if it has mu-Mimo.

John Downing
Kasowitz Benson Torres LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, CA 94065
Tel. (650) 453-5426

Fax. (650) 362-9430

JDowning@kasowitz.com